



STATE OF MARYLAND
DEPARTMENT OF HEALTH AND MENTAL HYGIENE
OFFICE OF ENVIRONMENTAL PROGRAMS
P.O. BOX 13387
201 W. PRESTON STREET
BALTIMORE, MARYLAND 21203
(301) 383-6650

BD ✓

SITE COMPLAINT

NUMBER	DATE
SC-0- 87-034	07/18/86

- Name of violator: BALTIMORE POST OFFICE
Address: 60 WEST OLIVER STREET MD 21201
County: BALTIMORE, MD 21201 Phone: 301-635-8933
- Violation Type (with reference to Maryland Code)
☐ Water Pollution Control and Abatement (Health Environmental Article, Sections 9-301 through 9-344)
☒ Controlled Hazardous Substances (Health Environmental Article, Sections 7-201 through 7-268)
☐ Landfills and Sludge Disposal (Health Environmental Article, Section 9-210)
☐ Other
- Specifically: On June 3rd 1986 I inspected the facility and gave
them till July 3rd 1986 to comply with COMAR 10.51.03.05, 10.51.05.02
10.51.05.04 and 10.51.05.09.
- The existence of the above-mentioned violation(s) may subject you to prosecution and penalty. Accordingly, you are advised that the following corrective actions are necessary to remedy the violation(s).
At present there are ^{SIGHT} waste drums in the facility.
BALTIMORE Post Office has till August 4th 1986 to ship the
waste drum, to develop a contingency plan & emergency procedures
and to build a containment area.
- Continuation of the violation(s) or failure to take the corrective action described above may result in the Department seeking legal sanctions against you, including the imposition of civil and/or criminal penalties.
- "I hereby acknowledge receipt of this Site Complaint by my signature, which is not an admission of guilt."

Person issued to: Ronald N. Bonforte Jr. Title: Asst. Sec. Mgmt.
Authorized by: William Eichbaum
Assistant Secretary for
Environmental Programs Issued by: Signorie Rotta
Inspector
Phone: 301-295-5731



State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 West Preston Street, Baltimore, Maryland 21201

Dye

Report of Observations

Type of Inspection/Observations: RERA Follow up Date 08/26/86

Facility Name: US Postal Service

Remarks: Vehicle Maintenance

60 West Oliver Street

Baltimore, MD. 21201

~~Hazardous Waste~~

On August 4th 1986 U.S. Postal Service
was ordered to build a containment area for the
hazardous waste and to develop a contingency
plan and emergency procedures.

On the above date I met with Mr.
Peter Leonard for a follow up inspection. The
following was noted: The containment area
for the hazardous waste is built. The contingency
plan and emergency procedures is developed.

The facility must give a classroom
on site training for the facility personnel.

Observer: Jessie Retto
DHMH 3879

Person Interviewed: [Signature] 8-26

Hazardous Waste Quantity Notification

Business Name

U.S. POSTAL SERVICE
Superintendent, Vehicle Maintenance

Business Address

60 W. Oliver Street
Baltimore, Maryland 21233-9603

EPA ID Number

M D D 98 070 7483

Hazardous Waste Generated

0 - 100 kg/month

☐

100 - 1000 kg/month

☒

1000 kg/month or more

☐

A. D. Redd, Supt. Veh Maint

Signature and Title



Official Business
Penalty for Private Use
\$300

FIRST-CLASS MAIL
POSTAGE & FEES PAID
EPA
PERMIT NO. G-35

United States
Environmental Protection
Agency

Washington DC 20460

Environmental Protection Agency

JOHN A ARMSTEAD
VA/WV SECTION (3HW31)
US EPA REGION III
841 CHESTNUT ST.
PHILADELPHIA, PA 19107

EPA Form 5180-11 (5-79)

VEHICLE MAINTENANCE FACILITY



December 6, 2004

Samantha P. Fairchild, Director
Office of Enforcement, Compliance and Environmental Justice
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Fairchild

I received the attached letter indicating that a Notice of Violation was issued for the U.S. Postal Service Baltimore Vehicle Maintenance Facility at 60 W Oliver Street, Baltimore MD. I have contacted DPRA Inc. and a representative will be here tomorrow, December 7, 2004 to obtain a sample of the paint booth filters. The representative, Jon Kallen, could not give me an exact date of completion, but indicated that it should be within the thirty days allowed in your letter.

As soon as the results are available I will send them to you.

Sincerely

A handwritten signature in black ink, appearing to read "Leonard C. Peters". The signature is fluid and cursive, with the first name "Leonard" being more prominent.

Leonard C. Peters
Manager Vehicle Maintenance
U.S. Postal Service
Baltimore MD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Leonard Peters, Manager
United States Postal Service
Baltimore Vehicle Maintenance Facility
60 W. Oliver Street
Baltimore, Maryland 21201-5783

Re: Notice of Violation
Compliance Evaluation Inspection
November 24, 2003
Baltimore Vehicle Maintenance Facility
EPA ID No. MDD980707483

Docket No.: R3-05-NOV-RCRA-04

Dear Mr. Peters:

On November 24, 2003, the U.S. Environmental Protection Agency, Region III ("EPA") conducted a Compliance Evaluation Inspection ("CEI") under the Code of Maryland Annotated Regulations ("COMAR") and the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. This CEI was part of a multi-media inspection conducted at your facility. Based on the inspection, EPA has determined that the United States Postal Service - Baltimore Vehicle Maintenance Facility ("BVMF" or the "Facility") was in violation of regulations promulgated under the COMAR and RCRA. As a result of this finding, the Agency is issuing this **Notice of Violation (NOV)**. The specific violation is:

1. At the time of the November 24, 2003 inspection, the EPA inspectors observed the facility's paint spray booth equipped with an air circulation system that contains 40 exhaust filters and 8 intake filters. According to facility representatives, the spent air filters had never been analyzed for hazardous characteristics. The filters are changed about every six months, and are disposed as regular trash.

Under COMAR 26.13.03.02, a person who generates a solid waste, as defined in COMAR 26.13.02.02, shall determine if that waste is a hazardous waste using the following method: The person should first determine if the waste is excluded from regulation under COMAR 26.13.02.04 - .04-5. He shall then determine if the waste is listed as a hazardous waste in COMAR 26.13.02.15 - .19. If the waste is not listed as a hazardous waste in COMAR 26.13.02.15 - .19, he shall determine whether the waste is identified by either: (a) Testing the waste or (b) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.


BVMF failed to determine whether the spent air filters were hazardous waste, as required under COMAR 26.13.03.02.

A copy of the inspection report was sent to your office on February 10, 2004, but an extra copy of the report, documenting the findings of the EPA's inspectors, is enclosed for your information.

Within thirty (30) calendar days of the receipt of this NOV, please submit documentation of any measures the United States Postal Service - Baltimore Vehicle Maintenance Facility has taken or is taking to achieve compliance with the regulation noted above or provide an explanation of facts and circumstances that cause you to believe that EPA's determination of the alleged violation is in error. If the compliance measures identified are planned or are on-going, please provide a schedule for completing the compliance measures. Section 3008(a) of RCRA authorizes EPA to take an enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as amended. Such an action could include a penalty of up to \$27,500 per day of violation. In addition, failure to achieve and maintain compliance with the regulation cited in this NOV may be treated as a repeated offense and may constitute a "knowing" violation of Federal law.

This NOV is not intended to address all past violations, nor does it preclude EPA from including any ongoing, including the ones cited in this letter, or past violations in any future enforcement action. The response to this NOV shall be addressed to:

José J. Jiménez
U.S. Environmental Protection Agency - Region III
Office of Enforcement, Compliance and Environmental Justice (3EC00)
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029


Samantha P. Fairchild, Director
Office of Enforcement, Compliance
and Environmental Justice

11/23/04
Date

Enclosure

cc: B. Dye (MDE) w/o enclosure
G. Crutchley (3EC10)w/o enclosure
J. Jiménez (3EC00)w/o enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Notice of Violation
United States Postal Service
Baltimore Vehicle Maintenance Facility

November 5, 2004

FROM: José J. Jiménez, Environmental Engineer
RCRA Compliance and Enforcement Branch (3EC00)

TO: Samantha P. Fairchild, Director
Office of Enforcement, Compliance and Environmental Justice (3EC00)

I recommend that you sign the attached Notice of Violation which addresses a violation under the Code of Maryland Annotated Regulations ("COMAR"), and the Resource Conservation and Recovery Act ("RCRA"), by the United States Postal Service Baltimore Vehicle Maintenance Facility located in Baltimore, Maryland.

A. Respondent

United States Postal Service Baltimore Vehicle Maintenance Facility
EPA ID No. MDD980707483

B. Type of Action

The recommended action is a Notice of Violation for a RCRA Subtitle C violation.

C. Summary of the Case

The United States Postal Service Baltimore Vehicle Maintenance Facility is a Conditionally Exempt Small Quantity Generator. The facility has not prior violations under the RCRA program. On November 24, 2003, the or Office visited the facility to conduct a multi-media inspection. Based on the inspection, EPA has determined that United States Postal Service Baltimore - Vehicle Maintenance Facility was in violation of regulations promulgated under the COMAR and RCRA.

At the time inspection, the EPA inspectors observed the facility's paint spray booth. The booth is equipped with an air circulation system that contains 40 exhaust filters and 8 intake filters. According to facility representatives, the spent air filters had never been analyzed for hazardous characteristics. The filters are changed about every six months, and are disposed of as regular trash.

Under state and federal requirements a generator of a solid waste shall determine if that waste is a hazardous waste

D. State or City Involvement

The State's enforcement contact was notified on October 28, on this coming enforcement action. On November 4, 2004, I spoke with Rick Johnson, from the Maryland Department of the Environment, to discuss this Notice.

E. Respondent's RCRA History

No violations over the last five years.

F. EPA Policy Impact

This case is consistent with EPA policy.

G. Public and Congressional Relations

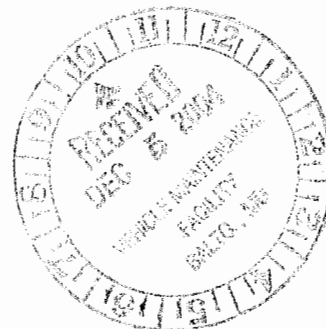
No special or congressional concern is expected in response to this action.



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CERTIFIED MAIL
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Compliance Evaluation Inspection
November 24, 2003
Baltimore Vehicle Maintenance Facility
EPA ID No. MDD980707483

Docket No.: R3-05-NOV-RCRA-04

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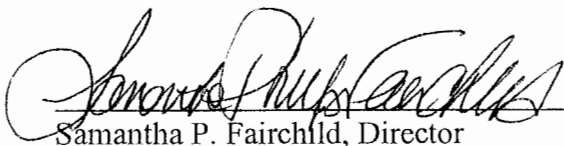
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Samantha P. Fairchild, Director
Office of Enforcement, Compliance
and Environmental Justice

11/23/04
Date

Enclosure

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